

Exhibit 12

November 13, 2020

58 to 61

<p style="text-align: right;">Page 58</p> <p>1 -- BRIAN STEVENS --</p> <p>2 Q. And so with respect to that direct</p> <p>3 experience within financial services organization,</p> <p>4 is there anyone who had more of that experience in</p> <p>5 Google Cloud than Ms. Rowe?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. In Cloud perhaps, but not that I'm</p> <p>8 aware of.</p> <p>9 Q. Did you ever have any conversations</p> <p>10 with Mr. Grannis regarding Ms. Rowe's role</p> <p>11 specifically?</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. Not that I recall specifically.</p> <p>14 Q. Did you ever have any discussions</p> <p>15 with Mr. Grannis regarding Ms. Rowe's trajectory</p> <p>16 at the company?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. No, not that I recall.</p> <p>19 Q. Did you have any conversations with</p> <p>20 Mr. Grannis regarding Ms. Rowe's performance?</p> <p>21 A. Not that I recall.</p> <p>22 Q. Did you have any conversations with</p> <p>23 Mr. Grannis regarding Ms. Rowe's compensation?</p> <p>24 A. Not that I recall.</p> <p>25 Q. Did you have any conversations with</p>	<p style="text-align: right;">Page 60</p> <p>1 -- BRIAN STEVENS --</p> <p>2 A. No, not particular, no.</p> <p>3 Q. Did you have any -- while you were at</p> <p>4 Google, did you have any conversations with anyone</p> <p>5 regarding Ms. Rowe's performance?</p> <p>6 A. No, not that I recall.</p> <p>7 MR. GAGE: Objection.</p> <p>8 Q. While you were at the company, did</p> <p>9 you have any conversations with anyone regarding</p> <p>10 Ms. Rowe's compensation?</p> <p>11 A. Not that I recall.</p> <p>12 MR. GAGE: Objection.</p> <p>13 Q. Okay. Did you play any role in</p> <p>14 setting Ms. Rowe's compensation at the time of her</p> <p>15 hire?</p> <p>16 A. Typically I wouldn't have.</p> <p>17 Q. Typically you wouldn't have what?</p> <p>18 A. Played a role in her compensation</p> <p>19 unless an exception needed to be made.</p> <p>20 Q. Do you recall any of the technical</p> <p>21 directors for whom you played a role in setting</p> <p>22 their initial compensation?</p> <p>23 A. No, I don't recall being involved in</p> <p>24 the compensation.</p> <p>25 Q. Did you play any role in setting what</p>
<p style="text-align: right;">Page 59</p> <p>1 -- BRIAN STEVENS --</p> <p>2 Diane Greene regarding Ms. Rowe's role?</p> <p>3 A. Not that I recall.</p> <p>4 Q. Did you have any conversations with</p> <p>5 Diane Greene regarding Ms. Rowe's trajectory at</p> <p>6 the company?</p> <p>7 A. Not that I recall.</p> <p>8 Q. Did you have any conversations with</p> <p>9 Diane Greene regarding Ms. Rowe's performance?</p> <p>10 A. No, not that I recall.</p> <p>11 Q. Did you have any conversations with</p> <p>12 Diane Greene regarding Ms. Rowe's compensation?</p> <p>13 A. No, not that I recall.</p> <p>14 Q. Did you have any conversations with</p> <p>15 anyone regarding Ms. Rowe's role at the company?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. Her current role? I don't think I</p> <p>18 understand that question.</p> <p>19 Q. When you were there, did you have any</p> <p>20 conversations with anyone regarding Ms. Rowe and</p> <p>21 her role at the company, her job at the company?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. Possibly.</p> <p>24 Q. Any that you recall with</p> <p>25 particularity?</p>	<p style="text-align: right;">Page 61</p> <p>1 -- BRIAN STEVENS --</p> <p>2 Ms. Rowe's level would be?</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. Yeah, that's a broad question. I was</p> <p>5 targeting -- you know, we were targeting Level 8</p> <p>6 hires in the CTO office, so not directly.</p> <p>7 Q. Were some individuals brought in as</p> <p>8 Level 9?</p> <p>9 A. Yes.</p> <p>10 Q. Were you involved in the decision to</p> <p>11 bring individuals in at a Level 9?</p> <p>12 A. Indirectly.</p> <p>13 Q. In what way were you indirectly</p> <p>14 involved?</p> <p>15 A. As the manager of Will.</p> <p>16 Q. And how did that indirect involvement</p> <p>17 relate to hiring people as Level 9?</p> <p>18 A. Typically I'd be the approver, the</p> <p>19 final approver.</p> <p>20 Q. And so would Mr. Grannis make the</p> <p>21 recommendation with respect to what level someone</p> <p>22 should be brought in?</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. Not independently.</p> <p>25 Q. What's your understanding of how the</p>

November 13, 2020

62 to 65

<p style="text-align: right;">Page 62</p> <p>1 -- BRIAN STEVENS --</p> <p>2 recommendation for what level someone should be</p> <p>3 brought in was determined?</p> <p>4 A. By following a Google process for</p> <p>5 calibration -- calibrating employees.</p> <p>6 Q. And what's your understanding of what</p> <p>7 that Google process for calibration entails?</p> <p>8 A. It entails many -- analyzing the</p> <p>9 results of many interviews, and job experience</p> <p>10 against a job description.</p> <p>11 Q. At the time that first wave was</p> <p>12 hired, do you know whether there was a ladder for</p> <p>13 the technical directors?</p> <p>14 A. There was. You always need to hire</p> <p>15 against a ladder, yes.</p> <p>16 Q. At the time you approved the</p> <p>17 recommendations for level of hire, did you inquire</p> <p>18 as to whether the calibration process had been</p> <p>19 followed?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. The -- I didn't audit the process, if</p> <p>22 that's what you're asking.</p> <p>23 Q. I'm asking if you said, hey, did you</p> <p>24 follow the process, or anything like that?</p> <p>25 A. HR guides the -- HR guides the</p>	<p style="text-align: right;">Page 64</p> <p>1 -- BRIAN STEVENS --</p> <p>2 A. The creation of a centralized team</p> <p>3 focused on verticals.</p> <p>4 Q. Actually, I want you to look at</p> <p>5 another document. Well, actually we'll wait</p> <p>6 because you're not a recipient on this one, so I'm</p> <p>7 going to ask you a few questions first.</p> <p>8 At some point in time while Ms. Rowe</p> <p>9 was still in the office of the CTO, was there a</p> <p>10 discussion about reorganizing Mr. Grannis' direct</p> <p>11 reports?</p> <p>12 A. Not that I'm aware of.</p> <p>13 Q. Do you recall a discussion about</p> <p>14 creating a verticals group under Mr. Grannis?</p> <p>15 A. No, I don't recall that.</p> <p>16 Q. Do you recall any discussion about</p> <p>17 Ms. Rowe leading a verticals group under</p> <p>18 Mr. Grannis?</p> <p>19 A. No, I don't recall that.</p> <p>20 Q. That wasn't something that</p> <p>21 Mr. Grannis discussed with you?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. Not that I recall. Will discusses</p> <p>24 many things.</p> <p>25 Q. Okay. And so again if you can just</p>
<p style="text-align: right;">Page 63</p> <p>1 -- BRIAN STEVENS --</p> <p>2 process.</p> <p>3 Q. So by the time it comes to you, you</p> <p>4 assume the process had been followed?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. Typically, yes.</p> <p>7 Q. Did you -- do you recall whether you</p> <p>8 asked for any documentation supporting the level</p> <p>9 recommendation?</p> <p>10 MR. GAGE: Objection.</p> <p>11 A. Yeah, not that I recall.</p> <p>12 Q. Do you recall asking what factors</p> <p>13 were supporting a hire as a Level 9 as opposed to</p> <p>14 a Level 8?</p> <p>15 A. No, I don't recall.</p> <p>16 MR. GAGE: Objection.</p> <p>17 Q. Do you know factors Mr. Grannis and</p> <p>18 HR considered with respect to the levelling?</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. I do not recall the details of the --</p> <p>21 of the levelling attributes.</p> <p>22 Q. At some point in time was Ms. Rowe</p> <p>23 moved out of OCTO?</p> <p>24 A. Yes, she was.</p> <p>25 Q. And how did that come about?</p>	<p style="text-align: right;">Page 65</p> <p>1 -- BRIAN STEVENS --</p> <p>2 repeat your answer for how it came to be that</p> <p>3 Ms. Rowe was moved out of OCTO.</p> <p>4 A. Diane Greene reassigned Tariq</p> <p>5 Shaukat, and one of his responsibilities was to</p> <p>6 lead a central verticals function.</p> <p>7 Q. Can you tell me what you mean by</p> <p>8 "central verticals function"?</p> <p>9 A. Central verticals function meaning</p> <p>10 lead industry teams focused on certain industry</p> <p>11 sectors.</p> <p>12 Q. And so how did that relate to</p> <p>13 Ms. Rowe being moved out of OCTO?</p> <p>14 A. There was recognized that people</p> <p>15 within OCTO had domain expertise within key</p> <p>16 verticals and were expected to move into a</p> <p>17 centralized role, centralized group.</p> <p>18 Q. And who were those individuals who</p> <p>19 were recognized as having domain expertise?</p> <p>20 A. From recollection, Ulku, Evren, Ben</p> <p>21 and Jeff Kemper.</p> <p>22 Q. And what was the domain expertise</p> <p>23 that Ulku was recognized as having?</p> <p>24 A. For financial services.</p> <p>25 Q. And was that expertise recognized --</p>